

EXHIBIT G

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

- - -

ALISON O'DONNELL,

Plaintiff,

vs.

Case No. 1:16-cv-2450
Judge Donald E. Nugent

UNIVERSITY HOSPITALS
HEALTH SYSTEM, et al.,

Defendants.

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DEPOSITION OF JULIE A. CHESTER
Monday, August 7, 2017

- - -

The deposition of JULIE A. CHESTER, a
witness, called for examination by the
Plaintiff under the Federal Rules of Civil
Procedure, taken before me, Diane M. Stevenson,
a Registered Diplomate Reporter, Certified
Realtime Reporter, and Notary Public in and for
the state of Ohio, pursuant to notice, at The
Spitz Law Firm, 25200 Chagrin Blvd., Suite 200,
Beachwood, Ohio, commencing at 8:58 a.m., the
day and date above set forth.

Stevenson Reporting Service, Inc.
2197 Macon Court Westlake, Ohio 44145
440.892.8600 diane@nls.net

1 Q. I know you don't recall everybody that you
2 spoke to, but did you look into the essential
3 functions?

4 A. Yes, with the department.

5 Q. Okay.

6 A. And assuring that we had the accurate, up-to-
7 date essential functions of the job.

8 Q. So it looks like from the emails, and I am just
9 looking at a couple of emails, like Exhibit 11
10 says, "Thank you for taking the time to meet
11 with me this afternoon," so it looks like on
12 May 11, 2012, you and Dr. Matthews met?

13 A. Correct.

14 Q. And it looks like from the email, the documents
15 that counsel presented, that there was either
16 email communications or in-person
17 communications not only on May 11th but a
18 number of times between you and Dr. Matthews?

19 A. Yes, I do remember meeting with her multiple
20 times. I just don't have the specific detail
21 or dates, yes.

22 Q. And it looks like there was discussion about
23 the accommodation when the two of you met?

24 A. Yes.

25 Q. And just one example of it as to this, like,

1 February meeting with Dr. Uli, right?

2 A. Correct.

3 Q. So I see, as a final point, I see in her -- she
4 uses some, I guess I would say, as a lawyer in
5 HR, some buzzwords; "bullying," I think she
6 uses. Did you explore what she meant by that
7 in your meetings with her?

8 A. We did. Again, I don't know all the specifics,
9 but certainly all the allegations that she
10 brought forward we fully investigated, talked
11 to appropriate parties, and weren't able to
12 provide -- or there wasn't any substantiation
13 to any of her allegations.

14 Q. And if you would have found race
15 discrimination, for example, I am not saying
16 whether she alleged it, but if you would have
17 found it, would HR have responded?

18 A. Absolutely.

19 Q. Had you found that she was being bullied in
20 some fashion by employees at UH, would HR have
21 responded?

22 A. Absolutely.

23 Q. So it is fair to say that although you don't
24 recall every person you spoke to about all of
25 the allegations, HR, either you or somebody on

1 your team, spoke with Dr. Matthews about what
2 she meant by *bullying* or *harassment*, or other
3 buzzwords that she used, and that you would
4 have looked further into it?

5 A. Yes.

6 Q. And based on the fact that, I take it, that
7 there were no disciplinary actions against
8 Dr. Uli or other members of the department,
9 that HR concluded that these allegations were
10 not substantiated?

11:56

11 A. Correct.

12 MR. CAMPBELL: I don't have any
13 further questions.

14 - - -

15 RE CROSS-EXAMINATION

16 BY MR. BEAN:

17 Q. Was there ever -- you said that there was a
18 conclusion that these allegations were not
19 substantiated. Was there ever a document that
20 memorialized this, that memorialized, you know,
21 that walked through "Dr. O'Donnell, you made
22 these complaints. Here is who we interviewed.
23 Here is what they said. And it is our
24 conclusion that it is unsubstantiated."

11:56

25 I mean, I have seen a lot of those